

Serial No. 09/624,337

**REMARKS****INTRODUCTION**

Claims 56-80 were previously and are currently pending and under consideration.

Claims 56-80 are rejected.

Claims 56-79 are amended herein.

No new matter is being presented, and approval and entry are respectfully requested.

**REJECTIONS UNDER 35 USC § 102**Overview

In the Office Action, at pages 2-9, claims 56-80 were rejected under 35 U.S.C. § 102 as anticipated by Goss. This rejection is traversed and reconsideration is requested.

With respect to the various arguments below, it is respectfully noted that: Where the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it (MPEP § 707.07(f)). Furthermore, MPEP § 707.07(f) states that although an "[a]pplicant's arguments with respect to [claims] have been considered ... moot in view of the new ground(s) of rejection ... "[t]he examiner must, however, address any arguments presented by the applicant which are still relevant to any references being applied."

Applicant respectfully requests a response to each individual argument below. With respect to the substantively unamended claims (e.g. dependent claims or claim 80), any new ground for rejection must be Non-Final.

Goss

Goss discusses a system for routing calls and messages between callcenters. Customer service agents are in different remote centers and a call is routed according to the skill and availability of an agent. Architecturally, when a call arrives, an Enterprise Contact Server is queried, and the Enterprise Contact Server then queries an Enterprise Router. The Enterprise Router then determines an appropriate destination for the call based on service agent skills,

Serial No. 09/624,337

availability, etc. Agents are registered with a Center Contact Server for their respective center. Each center's Center Contact Server works with the Enterprise Router to route a call to a particular agent.

To develop clear issues, Applicant respectfully requests the Examiner to explain any disagreement with the explanation of Goss above.

#### The Rejection

The rejection compares the data (now content) servers of the present claims to data sources described in Goss at column 3, lines 46-58. According to this portion of Goss, a data source is any source such as a database server or a mainframe that stores and serve data specific to whatever applications or services are provided by the call center. This appears to include trouble ticket services and other substantive information used by call center personnel that are fielding calls. Data sources in Goss are not Contact Servers or Enterprise Contact Servers.

The rejection states that push transmission of updates is taught at column 2, lines of 36-43 of Goss. The rejection mentions Center Contact Servers sending event messages to the Enterprise Contact Server.

#### Rejection Inconsistencies

The rejection is traversed due to a number of inconsistencies. According to MPEP § 706, "[t]he goal of examination is to clearly articulate any rejection early in the prosecution process so that the applicant has the opportunity to provide evidence of patentability and otherwise reply completely at the earliest opportunity." Furthermore, according to MPEP § 707.07(g), "[w]here a major technical rejection is proper, it should be stated with a full development of reasons rather than by a mere conclusion coupled with some stereotyped expression" (emphasis added). As discussed below, the rejection is traversed because it is unclear and/or inconsistent.

The rejection refers to both data sources and contact servers as comparable to the content servers of the present claims. However, the data sources and the contact servers in Goss appear to be different servers with different functions. In particular, users/subscribers do not appear to register with data sources but perhaps are registered with contact servers. The rejection also compares a human agent in Goss with an agent device in the claims, and yet the

Serial No. 09/624,337

rejection also compares contact servers to the claimed agent, noting that contact servers may register with each other. The Applicant cannot tell what in Goss is suggested to be the claimed agent, the content/data servers, terminals, etc.

Applicant respectfully requests the Examiner to either withdraw the rejection or explicitly state which components of Goss are believed to correspond to which elements (terminals, agent, content servers) in the claims.

Claims 56 and 70: Goss Is Not a Content Push Service System Pushing Content To Subscribers Thereof

Claim 56 and 70 are amended herein clarify a basic difference over Goss. Claims 56 and 70 recite a push service system or features cooperation therewith. This type of system can be, for example, a system where users register or subscribe to receive content, and content is pushed to the terminals of the users when the content is changed. Content servers serve content. Two definitions of "push" service are included herewith. Pointcast is a common example of a content push service. Consistent with the provided definitions, the claims are amended to clarify that the push service is a system for providing content to users who subscribe to the service, which pushes content from content servers. Goss' callcenter systems are not systems for pushing content to subscribers of content. Although an agent in Goss might be registered with a contact server, the agent is not registered for receiving particular pushed content. Rather an agent receives new call contact requests as they occur. Furthermore, none of the servers or data sources in Goss are content servers that server content.

As shown by the attached definitions, one skilled in the art, in view of the Applicant's specification and amended claims, would not consider sending a contact request to a human agent as equivalent to pushing content to a terminal (or agent) of a subscriber of a content-push service. For one reason, the agent in Goss is not a subscriber of content, and a call connect request is not content update information push-served by the system. Rather, a contact request is an ephemeral one-time piece of information - it is not updated and no subscriber receives pushed content as a result of updating a contact request. Not only are call contact requests not updated, but they are not part of content subscribed to by different individual subscribers. Instead, contact requests are generated, forwarded to one individual, and then removed. This type of information is short-lived and is not content subscribed to by subscribers.

Serial No. 09/624,337

Claim 80

Claim 80 recites receiving over the network at the intermediary agent registrations from clients, the registrations indicating different types of information of interest to different clients, whereby a client registers with the intermediary agent its respective information type. The intermediary agent receives update notices pushed over the network from the information servers, where the update notices are pushed from the information servers responsive to such servers having detected that their served information has been updated, and where the update notices indicate respective types of information updated at the information servers.

An advantage in claim 80 is that a push service can be efficiently managed by content type and traffic can be reduced by using an intermediary agent. By having clients register by information type, it is possible to send push information only to those clients that it will be of interest to. These advantages are not found in the prior art.

Furthermore, the rejection provides no explanation of where these information-type registration features are found in Goss. The rejection mentions registering Contact Servers, but no discussion or citation is provided with respect to "registrations indicating different types of information of interest to different clients", or "update notices indicate respective types of information updated at the information servers" etc. Applicant cannot respond to the rejection of claim 80 because the rejection does not explain how Goss teaches each of its features. The rejection should be withdrawn or further explanation of the rejection of claim 80 should be provided in a new Non-Final Office Action.

Claims 57 and 71

The rejection compares claims 57 and 71 to column 6, lines 34-36 of Goss. Claims 57 and 71 recite the subscriber terminals accessing the content servers to obtain the content push-notified as having been updated. The rejection notes that a Network CTI Server in Goss receives call routing requests from a data access point via a Gateway and distributes these requests among a plurality of call center CTI servers. The rejection compares a server to a subscriber terminal, but a user terminal and server are clearly not equivalent. Furthermore, call routing requests are not information regarding update of subscribed-to content.

Withdrawal of the rejection is respectfully requested.

Serial No. 09/624,337

Claims 63 and 73

Claim 63 recites that the at least one agent has a table listing content servers that provide information, and when the at least one agent is notified by a content server not registered in the table that the information is going to be provided from the content server the at least one agent registers the content server into the table". In other words, the agent maintains a list of registered content servers. The rejection compares this to column 8, lines 51-53 of Goss. However, this portion of Goss discusses maintaining a state table of agents rather than of content servers. Claim 63 has a state table of content servers; a state list of agents is not analogous to a state list of content servers.

Withdrawal of the rejection is respectfully requested.

Claims 65 and 75

Claim 65 recites that when an agent receives a notification made by one of the content servers about addition or deletion of information of a content type managed by one of the content servers, the agent adds or deletes the content server related to the data type to/from the content type management information. In other words, the agent manages content types, and automatically keeps track of which content servers serve what types of content. The rejection cites column 16, lines 43-48 of Goss. First, the cited portion of Goss is a "function of a CallBack Server Running in a Web Server (column 16, lines 29-30). However, the rejection has already compared an agent to the contact server (page 5, item 8 of the Office Action), the Enterprise Contact Server (page 3, lines 10-14), and skilled human agents (page 4, lines 3-4). In a chain of claims having an agent, the agent cannot be given different meanings in different of the claims in the chain. In the case of claim 65, the agent is compared to both a contact server and a different web server (page 5, item 10). The rejection is inconsistent. The rejection of claim 65 compares the agent to the web server, but the web server completely lacks the features of the agent found in the claims upon which claim 65 depends.

Withdrawal of the rejection is respectfully requested.

Claims 66 and 76

The rejection compares notifying a customer that their call is being processed to a content push service system where subscriber terminals are notified when content type information managed by an agent changes. However, the cited portion of Goss does not

Serial No. 09/624,337

mention or suggest content type information changing. A call being connected does not change data type information managed by a contact server. Furthermore, the rejection has already stated (page 3, lines 3-5) that the terminal in claim 1 (claim 66's parent) is an agent that receives a contact request sent by a Center Contact Server. The rejection compares the terminal of claim 66 to a customer rather than a skilled agent. It is improper to treat one feature in a claim of chains (subscriber's terminal in claims 56 and 66) as equivalent to two different prior art elements (an agent, and a customer). The customer has not been shown to have the properties of the subscriber terminal recited in claim 56. For example, the customer has not been shown to be (and is not) configured to receive the update information from the agent unit to obtain the content updated, as recited in claim 1.

Withdrawal of the rejection is further respectfully requested.

#### **DEPENDENT CLAIMS**

The dependent claims are deemed patentable due at least to their dependence from allowable independent claims. These claims are also patentable due to their recitation of independently distinguishing features. For example, in addition to those features discussed above, claim 58 recites that "one agent comprises a plurality of subagents in a subnetwork connected to the network, and the user terminals register themselves into the subagents, and each of the subagents serves as a substitute of corresponding user terminals of the user terminals, the corresponding user terminals that have registered themselves into the each of the plurality of subagents." This feature is not taught or suggested by the prior art. Withdrawal of the rejection of the dependent claims is respectfully requested.

#### **CONCLUSION**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

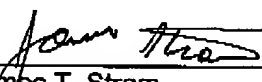
Serial No. 09/624,337

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

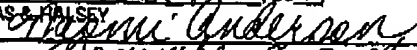
Date: 6 Nov 2004

By:   
James T. Strom  
Registration No. 48,702

1201 New York Avenue, NW, Suite 700  
Washington, D.C. 20005  
Telephone: (202) 434-1500  
Facsimile: (202) 434-1501

**CERTIFICATE OF FACSIMILE TRANSMISSION**

I hereby certify that this correspondence is being transmitted via facsimile to: Commissioner for Patents,  
P.O. Box 1450, Alexandria, VA 22313-1450  
on November 8, 2004

By:   
STAAS & HALSEY  
Date: November 8, 2004